

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

RUBY LEVI and EMILY CHICOINE on behalf)	
of themselves and all others similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civ. A. No. 1:15-cv-216S-PAS
GULLIVER’S TAVERN, INCORPORATED,)	
SOLID GOLD PROPERTIES, INC., all d/b/a)	
THE FOXY LADY,)	
)	
Defendants.)	

PLAINTIFFS’ ASSENTED-TO MOTION FOR FINAL SETTLEMENT APPROVAL

Pursuant to Federal Rule of Civil Procedure 23(e) and the Fair Labor Standards Act, 29 U.S.C. § 216(b), Plaintiffs Ruby Levi and Emily Chicoine respectfully move, with Defendants’ assent, for an order granting final approval of the parties’ settlement agreement (the “Agreement”); authorizing the parties to implement the terms of the Agreement; and dismissing this lawsuit (the “Action”) with prejudice and without costs. As discussed in the Memorandum accompanying this Motion, the Agreement, if approved, will provide significant monetary benefit to numerous individuals for whom recovery was otherwise uncertain, and who would only obtain recovery after substantial and expensive further litigation. Moreover, the terms of the Agreement are fair, reasonable, and adequate, and consistent with applicable precedent. Lastly, no Settlement Class Member has submitted an objection, and none have elected to opt out. Plaintiffs therefore respectfully request that the Court grant this motion. A proposed order is included as **Exhibit 5**.

Respectfully submitted,
RUBY LEVI and EMILY CHICOINE, behalf of
themselves and all others similarly situated,

By their attorneys,

/s/ Stephen J. Brouillard

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Dated: February 7, 2022.

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed electronically and is available for viewing and downloading from the ECF system. I further certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2022.

/s/ Stephen J. Brouillard
Stephen J. Brouillard, Esq.